

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03-cv-9849

**NOTICE OF RULE 60(a) MOTION FOR
CORRECTION TO PARTIAL FINAL JUDGMENT
FOR PLAINTIFF JAROSLAWA SKALA**

Plaintiffs by undersigned counsel move under Federal Rule of Civil Procedure 60(a) for an order correcting this Court's August 28, 2018 Order of Partial Final Default Judgments on Behalf of Burnett/Iran Plaintiffs Identified at Exhibit A (Burnett/Iran III) (ECF No. 4126) on behalf of a single Plaintiff, Jaroslawa Skala, and for reason state as follows:

- 1) Jaroslawa Skala was incorrectly identified as the sibling of 9/11 decedent John P. Slawa; however, Jaroslawa Skala is John P. Slawa's parent.
- 2) As a result of misidentification, the judgment was Jaroslawa Skala was awarded at the sibling solatium damages amount of \$4,250,000.00 rather than the parent solatium damages amount of \$8,500,000.00.
- 3) This error was the result of a clerical mistake or arose from an oversight or omission on the part of Plaintiffs' counsel.
- 4) This error has the potential to create issues for Plaintiff Jaroslawa Skala enforcing and collecting the judgment.

WHEREFORE, Plaintiffs respectfully request the issuance of the Corrected Order of Partial Final Default Judgment on Behalf of Jaroslawa Skala as set forth in Exhibit A to this motion.

Dated: September 12, 2018

Respectfully submitted,

/s/ Robert T. Haefele
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